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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DARLINE LINDA STINGLEY,
 Plaintiff,
 v.
 KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,
 Defendant.

Case No. 2:22-cv-01761-NJK

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 20), currently due on April 3, 2023, by 30 days, through and including May 3, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order be extended accordingly.

This is Defendant's first request for an extension of time for briefing. Good cause exists for this extension as Defendant needs additional time to explore settlement options. Since Plaintiff's motion was filed on March 2, 2023, Defendant's counsel has filed six briefs in other matters and negotiated settlement in a seventh case.

1 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's
2 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response
3 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.
4 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel
5 apologizes for any inconvenience.

6 On March 30, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no
7 opposition to this motion.

8 It is therefore respectfully requested that Defendant be granted an extension of time to respond
9 to Plaintiff's Motion for Reversal and Remand, through and including May 3, 2023.

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11 Dated: March 31, 2023

Respectfully submitted,

12 JASON M. FRIERSON
13 United States Attorney

14 /s/ Zachary Berkoff-Cane
15 ZACHARY BERKOFF-CANE
16 Special Assistant United States Attorney

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: April 3, 2023
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